

# COMPLAINTS POLICY

The Service Provider is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from retail clients or potential retail clients, and to keep a record of each complaint or grievance and the measures taken for the complaint's resolution.

This policy is established in order to provide the highest quality of service to all clients and in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

## **Definitions**

«Complainant» means any person, natural or legal, which is eligible to lodge a complaint to the Service Provider and who has already lodged a complaint.

«Complaint» means a statement of dissatisfaction addressed to the Service Provider by a complainant relating to the provision of investment services.

## **Core principles**

When the client/potential client/counterparty is not satisfied with the quality of service provided by Service Provider, (s)he has the right to complain. Any Client and/or potential client and/or counterparty can submit a complaint to Service Provider free of charge.

No clients/counterparties could be disadvantaged as a result of making a complaint. The Complaints management policy is available to all relevant staff of the firm through adequate internal channels of communication.

Service Provider will analyze, on an on-going basis, complaints handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

- a. Analyzing the causes of individual complaints to identify root causes common to types of complaints,
- b. Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
- c. Correcting, where reasonable to do so, such root causes.

If the Complainant is not satisfied how the complaint is handled by Service Provider.

## **Complaints Handling Process**

The following information should be provided by the complainant for lodging a complaint:

- 1) Complainant Name
- 2) Complainant Surname
- 3) Identification Number
- 4) Contact details (phone, e-mail, address, country)
- 5) Description of the issue
- 6) Sum of money involved (where applicable)
- 7) Department or organizational unit and/or details of employee who provided service to the complainant
- 8) Date

The Complaint should be submitted or via the Complaint Form (Appendix A) or via I

The following information will be provided to the Complainant:

- 1) Unique Reference Number of the Complaint that should be used in all your future contact with the Company, the Regulatory Authority regarding the specific complaint
- 2) Written information regarding the complaints-handling process or the link to the source

where the written information regarding the complaints-handling process could be read (e.g. Link to the website of Service Provider where the Complaints-handling process is published)

- 3) The acknowledgment of the receipt of the Complaint that will be sent to the Complainant within 5 working dates from the date of the receipt of the Complaint
- 4) The identity and contact details of the person or department to whom the complaint is directed
- 5) The indicative handling time
- 6) The availability (where applicable) to contact the Regulatory Authority or the relevant Courts.

Service Provider when receives a complaint will:

- 1) Keep the complainant informed about further handling of the complaint
- 2) Gather and investigate all relevant evidence and information regarding the complaint
- 3) Review the complaint carefully, investigate the circumstances surrounding the complaint
- 4) Communicating in plain language is clearly understood.
- 5) Provide a response without any unnecessary delay.
- 6) When an answer cannot be provided within the expected time limits, it should inform the complainant about the causes of the delay and indicate when the Service Provider investigation is likely to be completed.
- 7) Make every effort to investigate the complaint and provide with the outcome of the investigation within 4 weeks from the date the complaint is submitted to the Service Provider.
- 8) In the event that the complaint requires further investigation, and the Service Provider cannot resolve it within 4 weeks, Service Provider will issue a holding response in writing or another durable medium. When a response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, Service Provider shall provide the Complainant with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and the cooperation between the Complainant and Service Provider.
- 9) When making a final decision that does not fully satisfy the complainant's demands, to notify the complainant in writing using a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. Through the Regulatory and Licensing Authority, or the relevant Courts

The employee, who receives the Complaint, shall ensure that all the core details are provided. If any information is pending, the receiver of the complaint shall contact the Complainant and request the relevant details.

The Complainant may always contact the Service Provider via register address or email specified in the Accession Agreement.

**COMPLAINTS FORM**

This is the form the Complainant needs to fill in in order to submit the complaint to Service Provider (the “Company”). Complete, up-to-date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of the complaint.

The Complaint Form below is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence with regards to the complaint.

**DATE:****CLIENT INFORMATION**

Name:

Surname:

ID or Passport Number:

Country of nationality:

Legal Entity Name (in case the Client is a legal person):

Account Number:

**CONTACT DETAILS OF THE CLIENT**

Postal Address:

City/Province:

Code:

Country:

Telephone Number:

Email:

**DETAILS OF THE COMPLAINT**

Date when the Complaint was created:

Employee who offered the services to the Client (if applicable):

Description of the Complaint: (use a separate sheet if necessary)

☐ **I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.**

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**For Official Use Only**

Received on:	Assigned to:
Received by:	Signature